

United States District Court

SOUTHERN

DISTRICT OF

TEXAS

McALLEN DIVISION

UNITED STATES OF AMERICA

V.

CRIMINAL COMPLAINT

Luz Alfonso Ramirez-Hinojosa

YOB: 1985

Principal

he United Mexican States
Southern District of Texas
FILED

Case Number:

M-17-840-M

MAY 10 2017

(Name and Address of Defendant)

Clerk of Court

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. On or about May 9, 2017 in Starr County, in the Southern District of Texas defendants(s) did,
(Track Statutory Language of Offense)

knowing or in reckless disregard of the fact that Jhony Alberto Hernandez-Ramirez, a citizen and national of Guatemala, who had entered the United States in violation of law, did knowingly transport, or move or attempts to transport said alien in furtherance of such violation of law within the United States, that is, from a location near Roma, Texas, to the point of arrest near Roma, Texas.

in violation of Title 8 United States Code, Section(s) 1324(a)(1)(A)(ii) FELONY

I further state that I am a(n) U.S. Senior Border Patrol Agent and that this complaint is based on the following facts:

On May 9, 2017, a Border Patrol Agent observed a subject load into a black GMC truck near the intersection of Estrella Street and Guerra Street in Roma, Texas. This area is commonly used by undocumented aliens who utilize an arroyo near the area to conceal themselves. The arroyo commences at the Rio Grande River and ends approximately a quarter mile from the river, near the intersection of Estrella Street and Guerra Street. The agent was on Estrella Street approximately two blocks away, traveling towards the intersection, when he observed the subject exit the brush near the arroyo and board the black GMC truck. The black GMC truck, traveling towards the agent on Estrella Street, made an abrupt turn traveling away from the area.

SEE ATTACHED

Continued on the attached sheet and made a part of this complaint:

☒ Yes ☐ No

Approved Joseph Leonard
Sworn to before me and subscribed in my presence,

May 10, 2017
Date

Dorina Ramos, U. S. Magistrate Judge
Name and Title of Judicial Officer

Signature of Complainant

Jon M Chan

Senior Patrol Agent

Printed Name of Complainant

at McAllen, Texas
City and State

Signature of Judicial Officer

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
McALLEN, TEXAS**

ATTACHMENT TO CRIMINAL COMPLAINT:

M-17-840-M

RE: Luz Alfonso Ramirez-Hinojosa

The agent encountered the black GMC truck stopped at a traffic light with two occupants. The agent attempted to conduct a vehicle registration check, when the traffic light turned green and the black GMC truck sped off. The black GMC truck made several turns, traveling completely around a neighborhood block, in an apparent attempt to gain distance and lose the agent. The agent caught up to the black GMC truck and conducted a vehicle stop.

The agent approached the black GMC truck, identified himself as a Border Patrol Agent and proceeded to conduct an immigration inspection on the driver. The driver was identified as Luz Alfonso RAMIREZ-Hinojosa, a citizen of Mexico, illegally present in the United States.

A Border Patrol Agent responded to the neighborhood block, where the black GMC truck circled, and located a subject hiding under the brush. The subject was identified as Jhony Alberto HERNANDEZ-Ramirez, a citizen of Guatemala, illegally present in the United States. HERNANDEZ admitted to being recently dropped off by a truck.

Both subjects were placed under arrest and transported to the Rio Grande City Border Patrol Station for processing.

At the Rio Grande City Border Patrol Station, record checks were conducted on the driver, Luz Alfonso RAMIREZ-Hinojosa, which revealed he was a principal in two separate Alien Smuggling Cases totaling nine undocumented aliens.

Principal Statement:

Luz Alfonso RAMIREZ-Hinojosa was advised of his Miranda Rights, stated he understood his rights and agreed to answer questions without the presence of an attorney.

Luz Alfonso RAMIREZ-Hinojosa claimed he traveled from his house in Fronton, Texas to visit his friend in Roma, Texas and denied picking anybody up.

Material Witness Statement:

Jhony Alberto HERNANDEZ-Ramirez was advised of his Miranda Rights, stated he understood his rights and agreed to answer questions without the presence of an attorney.

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
McALLEN, TEXAS**

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CONTINUATION:

Jhony Alberto HERNANDEZ-Ramirez claimed he made arrangements with a smuggler to be smuggled into the United States and has paid 1,500 USD. HERNANDEZ stated he was going to pay an additional 2,000 USD once he arrived to Houston, Texas.

HERNANDEZ stated he crossed the Rio Grande River with two guides, who instructed him to walk in the arroyo for approximately two city blocks and wait for a phone call. HERNANDEZ received a phone call from a male subject who informed HERNANDEZ he was waiting for him in a black truck. While still on the phone with the male subject, HERNANDEZ walked out of the brush and saw the black truck. HERNANDEZ claimed the male subject told him over the phone to hurry and get in. HERNANDEZ stated the driver drove for a short time before a Border Patrol Unit got behind them. The driver drove around the block and instructed HERNANDEZ to get out and run. HERNANDEZ stated he jumped out of the moving truck and hid. Shortly after, HERNANDEZ was apprehended by Border Patrol.

HERNANDEZ identified Luz Alfonso RAMIREZ-Hinojosa through a photo lineup as the driver of the black GMC truck.